

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

PAUL BRADLEY MEAGHER

INDICTMENT

Case No. _____

Violation: 18 U.S.C. §§ 2252A(a)(2)(A),
2252A(a)(5)(B), 2252A(b)(1),
2252A(b)(2), and 2253(a)

COUNT ONE

Receipt of Materials Containing Child Pornography

The Grand Jury Charges:

From in or about August 2015 and continuing until on or about November 3, 2015,
in the District of North Dakota, and elsewhere,

PAUL BRADLEY MEAGHER

knowingly received child pornography, as defined in Title 18, United States Code,
Section 2256(8)(A), that had been shipped and transported using any means and facility
of interstate and foreign commerce, and in and affecting interstate and foreign commerce
by any means, including by computer; specifically, using an Asus computer,
SN: B7N0AS52522129F (containing a 500GB Seagate hard drive, SN: 5WS1M61C),
PAUL BRADLEY MEAGHER received numerous electronic files, which files contained
minors engaging in sexually explicit conduct, as defined in Title 18, United States Code,
Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and
2252A(b)(1).

COUNT TWO

Possession of Materials Containing Child Pornography

The Grand Jury Further Charges:

From on or about February 8, 2006, and continuing until on or about November 3, 2015, in the District of North Dakota,

PAUL BRADLEY MEAGHER

knowingly possessed and accessed with intent to view material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor that had not attained 12 years of age, and which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, PAUL BRADLEY MEAGHER knowingly possessed electronic files on a 500GB Seagate hard drive, SN: 5WR0CTDJ, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

COUNT THREE

Possession of Materials Containing Child Pornography

The Grand Jury Further Charges:

On or about November 3, 2015, in the District of North Dakota,

PAUL BRADLEY MEAGHER

knowingly possessed and accessed with intent to view material which contains an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor or a minor that had not attained 12 years of age, and which had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; specifically, PAUL BRADLEY MEAGHER knowingly possessed electronic files on a TDK CD, which files contain one or more visual depictions of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2);

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Section 2252A, as charged in this Indictment,

PAUL BRADLEY MEAGHER

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, mailed, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violation, including, but not limited to, the following:

- Asus computer, SN: B7N0AS52522129F (containing a 500GB Seagate hard drive, SN: 5WS1M61C)
- 500GB Seagate hard drive, SN: 5WR0CTDJ
- TDK CD seized from MEAGHER'S residence on November 3, 2015

By virtue of the commission of one or more of the felony offenses as charged in this Indictment by defendant, all right, title, and interest in the above-described property

is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

 /s/ Foreperson
Foreperson

 /s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

JKP:tla